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May 19, 2016

Federal Election Commission  
Attn: Jack Baisden  
Campaign Finance Analyst  
999 E Street, N.W.  
Washington, D.C. 20463

Re: Courageous Conservatives PAC (the "Committee")

Dear Jack Baisden:

This letter is in response to your letter dated May 8, 2016 concerning the March Monthly Report of the Committee. Your letter asked four question. This letter is in response to those questions.

You asked about an in-kind contribution being disclosed on Schedule A with no corresponding in-kind expense. In preparing the March Monthly Report, we had to delete the in-kind expense because this amount was already reported on Line 24 as an independent expenditure. If we did not delete this entry, the cash on hand would be off by the amount of this expenditure. The March Monthly Report has been amended to provide the following explanation:

The Committee's media consultant, Mountaintop Media, incurred certain expenses for robocalls that were not pre-approved by the Committee. These expenses were in the nature of independent expenditures so they were reported on an Independent Expenditure Report. Since these expenditures were not pre-approved, the media consultant agreed to treat these expenditures as an in-kind contribution. When preparing the Monthly FEC Report the expenditure side of this in-kind contribution was deleted from Line 21(b) because it was automatically being reported on Line 24 as an independent expenditure. This was necessary to avoid double reporting of the same expense and throwing off the ending cash on hand.

Your letter also asked for more detail on the loans to the Committee. All the loans to the committee are non-interest bearing demand loans. To address this issue, we amended the March Monthly Report to provide the following explanation:

All loans are non-interest bearing demand loans. Therefore, all the loans have no specific due date and the interest rate is zero.